

Fill in this information to identify the case:

3

Debtor 1	<u>DAVID LEE FERRELL, JR.</u>
Debtor 2 (Spouse, if filing)	<u>MARIAN B. FERRELL</u>
United States Bankruptcy Court for the:	<u>WESTERN</u>
	District of: <u>PA</u> (State)
Case number	<u>17-10189-TPA</u>

Form 4100R**Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: Federal Home Loan Mortgage Corporation, as Trustee for the benefit of the Freddie Mac Seasoned Loans Structured Transaction Trust, Series 2020-2 c/o Select Portfolio Servicing, Inc.

Court claim no. (if known):
6

Last 4 digits of any number you use to identify the debtor's account: 6 7 9 0

Property address: 14436 Lowville Street
Number Street

Wattsburg PA 16442
City State ZIP Code

Part 2: Prepetition Default Payments

Check one:

Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____

Part 3: Postpetition Mortgage Payment

Check one:

Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 05/01/2022

MM / DD / YYYY

Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due:

(a) \$

b. Total fees, charges, expenses, escrow, and costs outstanding:

+ (b) \$

c. **Total.** Add lines a and b.

(c) \$

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

MM / DD / YYYY

Debtor 1 DAVID LEE FERRELL, JR.
First Name Middle Name Last Name

Case number (if known) 17-10189-TPA

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- I am the creditor.
 I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

X /s/ Karina Velter, Esquire Date 04/21/2022
Signature

Print Karina Velter, Esquire Title Attorney
First Name Middle Name Last Name

Company Hladik, Onorato & Federman, LLP

If different from the notice address listed on the proof of claim to which this response applies:

Address 298 Wissahickon Avenue

Number Street

North Wales, PA 19454
City State ZIP Code

Contact phone (215) 855- 9521

Email kvelter@hoflawgroup.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re: : Bankruptcy No. 17-10189-TPA
David Lee Ferrell, Jr. and Marian B. Ferrell : Chapter 13
Debtor :
: Federal Home Loan Mortgage Corporation, as :
Trustee for the benefit of the Freddie Mac :
Seasoned Loans Structured Transaction Trust, :
Series 2020-2 c/o Select Portfolio Servicing, :
Inc :
Movant :
vs. :
: David Lee Ferrell, Jr. and Marian B. Ferrell :
Debtor/Respondent :
and :
Ronda J. Winnecur, Esquire :
Trustee/Respondent :

CERTIFICATE OF SERVICE

I, Karina Velter, Esq., hereby certify that I caused to be served true and correct copies of the **STATEMENT IN RESPONSE TO NOTICE OF FINAL CURE PAYMENT** at the respective last known address of each person set forth below on April 21, 2022:

Daniel P. Foster, Esquire
Via Electronic Filing
Attorney for Debtors

Ronda J. Winnecur Esquire
Via ECF:
cmecl@chapter13trusteewdpa.com
Trustee

David Lee Ferrell, Jr.
Marian B. Ferrell
P.O. Box 60
Wattsburg, PA 16442s

Via First Class Mail
Debtors

Date: 04/21/2022

Respectfully Submitted,
/s/ Karina Velter, Esquire
Karina Velter, Esquire
Hladik, Onorato & Federman, LLP
Attorney I.D. # 94781
298 Wissahickon Avenue
North Wales, PA 19454
Phone 215-855-9521
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